

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE  
MIDDLE DISTRICT OF ALABAMA, SOUTHERN DIVISION

CLAUDE GENE LEE, SR., )  
Plaintiff, )  
vs. ) CASE NO: 1:06-cv-874-MHT  
WESTPOINT HOME, INC., )  
Defendant. )

PLAINTIFF'S WITNESS TRIAL DISCLOSURES

COMES NOW the Plaintiff Claude Gene Lee, Sr. ("Lee") and pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure provides the following trial disclosures:

**WITNESSES:**

1. Claude Gene Lee, Sr.  
100 Murry Street  
Abbeville, Alabama 36310  
334-585-2642
  
2. Frank Major, III  
Assistant Department Manager Packing  
268 State Highway 27  
Abbeville, Alabama 36310
  
3. Bob Turner  
County Road 101  
Box 528

Abbeville, AL 36310  
334-585-2949

4. Michael Alford  
701-7428; 702-3460  
(Address unknown at this time)
5. Brendt Murphy  
Human Resources Manager  
268 State Highway 27  
Abbeville, Alabama 36310
6. Lottie Benson  
5553 County Road 26  
Columbia, AL 36319  
334-585-4537
7. Craig Taylor  
1536 Columbia Road  
Abbeville, AL 36310  
334-585-5273
8. Tameka Taylor  
1536 Columbia Road  
Abbeville, AL 36310  
334-585-5273
8. Clifford Frazier  
2406 Scott Road  
Dothan, AL 36303  
334-714-2456

9.         Angela Harvell  
               101 South Dale Court  
               Apt. #22  
               Abbeville, AL 36310  
               334-585-1127
10.         Kemesha McGahee  
               334-585-4656  
               (Address unknown at this time)
11.         Rosie Wright  
               334-585-1651  
               (Address unknown at this time)
12.         Woodrow Sluss  
               Director of Human Resources  
               2506 1<sup>st</sup> Avenue  
               Opelika, AL 36801  
               334-742-2407
13.         Billy Wayne Bedsole
14.         Any witnesses needed for rebuttal.
15.         Any person who did or will provide an affidavit in this action.
16.         Any person who has been deposed or may be deposed in this action.
17.         All witnesses listed on Defendant's witness list.
18.         Any individual or records custodians necessary to authenticate

any documents.

19. Any individual or records custodians necessary for the  
Introduction of any document.

20. Any individual and/or expert necessary for rebuttal.

21. Plaintiff reserves the right to amend his witness list.

/s/ Jay E. Tidwell  
Jay Tidwell (TID009)

OF COUNSEL:

**VEAL CLOUD & TIDWELL, LLC**  
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/s/ Stephen C. Wallace  
Stephen C. Wallace

OF COUNSEL:

**DAWSON & WALLACE, LLC**  
2229 Morris Avenue  
Birmingham, AL 35203  
(205)-323-61070  
(205) 278-3430 Fax

CERTIFICATE OF SERVICE

I hereby certify that on the 11<sup>th</sup> day of September 2007, I have served a copy of the above and foregoing on counsel for all parties by:

Facsimile transmission;

Hand Delivery;

Placing a copy of same in the United States Mail, properly addressed and first class postage prepaid to:

Using the CM/ECF system which will send notifications of such to the following:

David R. Boyd, Esq.  
Norman Walker, Esq.  
Kelly F. Pate, Esq.  
Balch & Bingham LLP  
Post Office box 78  
Montgomery, Alabama 36101-0078

/s/ Jay E. Tidwell  
Of Counsel

/s/ Stephen C. Wallace  
Of Counsel